

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FUNICULAR FUNDS, LP, individually and
on behalf of all others similarly situated,

Plaintiff,

Civil Action No. 22-10986-JSR

v.

PIONEER MERGER CORP., PIONEER
MERGER SPONSOR LLC, JONATHAN
CHRISTODORO, RICK GERSON, OSCAR
SALAZAR, RYAN KHOURY, SCOTT
CARPENTER, MATTHEW COREY,
MITCHELL CAPLAN, and TODD DAVIS,

Defendants.

**DECLARATION OF AARON T. MORRIS IN SUPPORT
OF MOTION FOR CLASS CERTIFICATION**

I, AARON T. MORRIS, an attorney duly admitted to practice law in the State of New York
and this District, state as follows pursuant to 28 U.S.C. § 1746:

1. I am a member of the Bar of this Court and a partner of the firm Morris Kandinov LLP, counsel to Plaintiff Funicular Funds, LP in the above-captioned action.
2. I respectfully submit this declaration in connection with Plaintiff's Motion For Class Certification.
3. Attached as Exhibit 1 is a true and correct list of disclosed holders of Class A common stock of Pioneer Merger Corp. according to data provided by Bloomberg. As demonstrated by Exhibit 1, Plaintiff Funicular Funds, LP is the largest public shareholder, excluding Alpha Wave Global LP, which is affiliated with Defendants.

4. This matter has been diligently litigated since filing, including briefing and argument on the pleadings, written discovery, depositions, and expert reports. Fact discovery is scheduled to close on October 26, 2023. Plaintiff has substantially completed its collection and production of documents, and Plaintiff's principal, Jacob Ma-Weaver, was deposed in this action on August 9, 2023 in his personal and representative capacities.

5. Attached as Exhibits 2 and 3 are firm resumes for Morris Kandinov LLP and AFN Law PLLC.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed: September 27, 2023
Stowe, Vermont

/s/ Aaron T. Morris
Aaron T. Morris